

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

JOHANZ X. SANTOS, ppa, DENISE)	C.A. NO.: 03-cv-12210-KPN
COLON, Individually, JESUS SANTOS,)	
Plaintiffs)	
)	
VS.)	
)	
BOB'S DISCOUNT FURNITURE,)	
REGENT HOME DELIVERY,)	
AGNILIZ ACOSTAS, RAUL SANTOS,)	
Defendants)	

**CONCISE STATEMENT OF THE DEFENDANT, BOB'S DISCOUNT
FURNITURE, IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

1. The accident occurred on March 30, 2002 on 27 Federal Street, Springfield (Answer to Interrogatory #4 of Denise Colon Santos).
2. There are "no parking" signs along the entire Federal Street (deposition Agniliz Acostas, p. 36, line 11-13).
3. Just prior to the accident, Johanz Santos was playing baseball with other children at 27 Federal Street (Answer to Interrogatory #4, Denise Colon Santos).
4. At the time of the accident there was a truck under the control of the Defendant, Bob's Discount Furniture, parked parallel to the curb in front of 27 Federal Street (Stipulation 9/24/2004, Interrogatories 4 and 5, Denise Colon Santos).
5. There was a "no parking" sign near where the truck was parked (Answer to Interrogatory #5, Denise Colon Santos).
6. Johanz Santos ran into the road chasing a ball in front of the truck and was struck by an automobile operated by Raul Santos (id).

THE DEFENDANT,
BOB'S DISCOUNT FURNITURE
By Its Attorney

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